

# EXHIBIT AA

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

In Re Ex Parte Application of Porsche Automobil Holding SE for an Order Pursuant to 28 U.S.C. § 1782 Granting Leave to Obtain Discovery for Use in Foreign Proceedings.

Case No. 15 MISC 0417

**[PROPOSED] ORDER GRANTING EX PARTE APPLICATION OF  
PORSCHE AUTOMOBIL HOLDING SE FOR AN ORDER  
PURSUANT TO 28 U.S.C. § 1782 GRANTING LEAVE TO OBTAIN  
DISCOVERY FOR USE IN FOREIGN PROCEEDINGS**

On December 23, 2015, Porsche Automobil Holding SE (“PSE”) submitted an *Ex Parte* Application for an Order Pursuant to 28 U.S.C. § 1782 Granting Leave to Obtain Discovery for Use in Foreign Proceedings (together with all supporting papers, the “Application”). The Application seeks leave to serve each of the entities (“Respondents”) listed in Exhibit A to the Declaration of Robert J. Giuffra, Jr., dated December 23, 2015 (the “Giuffra Declaration”), with subpoenas, in substantially the same form as those attached to the Giuffra Declaration as Exhibits B and C (the “Subpoenas”), for the production of documents and deposition testimony.

Upon consideration of the evidence and arguments presented in the Application, the Court concludes that the requirements of 28 U.S.C. § 1782 are met. The Application is therefore GRANTED, and the Court ORDERS as follows:

ORDERED that the Petitioner shall serve Respondents with the Subpoenas, the Application and this Order within five (5) days of the issuance of this Order and shall file proofs of service as soon as reasonably practicable thereafter;

ORDERED that any answer, response, or objection, including the production of documents and depositions, shall be made by Respondents within two weeks of the date of service.

**SO ORDERED.**

**Date:** \_\_\_\_\_

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United States District Judge